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MAR 1 4 2018

# UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF PENNSYLVANIA

| UNITED STATES OF AMERICA                              | ) | NO. 1:18 -02-0087.     |
|---|---|------------------------|
| <b>v.</b>   | ) | (JUDGE (are )          |
| NORWOOD DEMETRIO NUTTER,<br>DASHAWN NARDER JONES, and | ) |                        |
| SANTO FRANKLIN DORSEY                                 | ) | (FILED ELECTRONICALLY) |

### INDICTMENT

## COUNT 1

(Criminal Conspiracy to Pass Counterfeit Obligations or Securities) THE GRAND JURY CHARGES:

On or about October 29, 2017, within the Middle District of Pennsylvania and elsewhere, the defendants,

NORWOOD NUTTER, DASHAWN JONES and SANTO DORSEY knowingly and willfully conspired and agreed with each other, and other persons known and unknown to the Grand Jury, to commit the offense of passing counterfeit obligations or securities, that is, passing approximately six counterfeited one hundred dollar bills at Wal-Mart located at 3400 Hartzdale Drive, Camp Hill, PA, 17011, which is in and affecting interstate commerce, in violation of Title 18, United States Code, Section 472.

### **MANNER AND MEANS**

- 1. It was part of the conspiracy that the conspirators obtained and received counterfeit Federal Reserve Notes in denominations of \$100 and \$20.
- 2. It was part of the conspiracy that the conspirators passed the counterfeit Federal Reserve Notes at retailers within the Middle District of Pennsylvania.

## **Overt Acts**

In furtherance of the conspiracy and to attain the objects of the conspiracy, the conspirators committed the following overt acts, among others, in the Middle District of Pennsylvania:

- 1. On October 29, 2017, Norwood Nutter, Dashawn Jones and Santo Dorsey traveled to the Middle District of Pennsylvania from Maryland in a Cadillac bearing Maryland license plate 7CE-8639.
- On October 29, 2017, Dashawn Jones and Santo Dorsey made purchases at Wal-Mart, 3400 Hartzdale Drive, Camp Hill,
   Pennsylvania, 17011 using counterfeit one hundred dollar bills, while

Norwood Nutter waited to drive them away in a Cadillac bearing Maryland license plate 7CE-8639.

- 3. While waiting for Jones and Dorsey to make their purchases in Wal-Mart using counterfeit bills, Norwood Nutter sat in the driver's seat of the Cadillac bearing Maryland license plate 7CE-8639 on October 29, 2017, with additional counterfeit bills between the driver and front seat passenger seats of the vehicle.
- 4. On October 29, 2017, Norwood Nutter, Dashawn Jones and Santo Dorsey were in possession of additional counterfeit bills that were stored in a red bag located in the Cadillac.
- 5. On October 29, 2017, Dashawn Jones and Santo Dorsey made purchases at Wal-Mart, 1800 Loucks Road, York, Pennsylvania, 17408, using counterfeit one hundred dollar bills, while Norwood Nutter waited to drive them away in a Cadillac bearing Maryland license plate 7CE-8639.
- 6. On October 29, 2017, Dashawn Jones and Santo Dorsey made purchases at Wal-Mart, 2801 E. Market Street, York, Pennsylvania, 17402, using counterfeit one hundred dollar bills, while Norwood Nutter

waited to drive them away in a Cadillac bearing Maryland license plate 7CE-8639.

- 7. On October 29, 2017, Dashawn Jones and Santo Dorsey made purchases at Wal-Mart, 50 Newberry Parkway, Etters, Pennsylvania, 17319, using counterfeit one hundred dollar bills, while Norwood Nutter waited to drive them away in a Cadillac bearing Maryland license plate 7CE-8639.
- 8. On October 29, 2017, Dashawn Jones and Santo Dorsey made purchases at Wal-Mart, 698 Shrewsbury Commons Avenue, Shrewsbury, Pennsylvania, 17361, using counterfeit one hundred dollar bills, while Norwood Nutter waited to drive them away in a Cadillac bearing Maryland license plate 7CE-8639.

All in violation of Title 18, United States Code, § 371.

### COUNT 2

(Passing Counterfeit Obligations or Securities)
THE GRAND JURY FURTHER CHARGES:

On or about October 29, 2017, in the Middle District of Pennsylvania, the defendants,

NORWOOD NUTTER, DASHAWN JONES and SANTO DORSEY aiding and abetting one another and aided and abetted by one another, did knowingly and with the intent to defraud, pass to Wal-Mart located at 3400 Hartzdale Drive, Camp Hill, Pennsylvania, 17011, falsely made, forged and counterfeited obligations of the United States, that is, six (6) Federal Reserve Notes, each in the denomination of one hundred dollars, bearing serial numbers MP15933322L, XE53895894Y, SA44317753A, BV23665323B, PL88124346Y and MP15933323L, knowing them to be falsely made, forged and counterfeited.

In violation of Title 18, United States Code, Section 472, and Title 18, United States Code, Section 2.

A TRUE BILL

FOREPERSON, GRAND JURY

14-MAR-2018

DATE

DAVID J. FREED

UNITED STATES ATTORNEY

BY: MEREDITH ALTAYLOR

ASSISTANT U.S. ATTORNEY